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February 24, 2011

Mr. Julius Genachowski, Chairman
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: Federal-State Joint Board on Universal Service Lifeline and Link Up
CC Docket No. 96-45; WC Docket 03-109**

Dear Chairman Genachowski,

As you know, the Federal-State Joint Board on Universal Service Lifeline and Link Up recently provided its recommendations to the FCC. Allegheny County applauds the Board's efforts to address the issues concerning Lifeline and Link Up. As this country continues to rise from the worst economic recession since the Great Depression, Lifeline service – especially free service – is vital to low-income families' ability to stay connected to family members, potential employers, and above all, public safety providers.

We agree with the Board's recommendation that the Commission should look for ways to adopt uniformity in areas such as verification procedures and sampling criteria, which would apply to all Eligible Telecommunications Carriers in order to minimize waste, fraud and abuse. However, one area of concern is the discussion of capping low-income support. Historically, the low-income support of the fund has had a very low penetration rate, and while cost has grown in the low-income support, it is still minimal compared to the area of high cost. Likewise, it makes little sense to consider adding mandatory (even minimal) monthly subscriber fees for Lifeline users, which would present an undue administrative burden on both carriers and consumers. The best approach to curtailing fraud and abuse is establishment of an eligibility database.

In this context, we must consider that low-income support is cyclical. In times of economic strife, such as the one we are currently facing, it is logical for this area of support to increase. When the economy is prosperous, families are working and meeting their economic needs, and therefore, support for the area would decrease.

We urge the Commission to consider these recommendations outlined in the report. However, the Commission should not adopt measures or practices that hinder the Lifeline subscriber, such as capping support or adopting policies that limit competition in a market that has been largely ignored for decades.

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Onorato'.

Dan Onorato
Allegheny County Executive